

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Imani Chinda, Plaintiff

HSA St. Joseph LLC, Defendant

§
§
§
§
§
§

Case No. 4:24-cv-5106

**UNOPPOSED MOTION FOR LEAVE TO FILE
DEFENDANT’S RESPONSIVE PLEADING OUT OF TIME**

Defendant HSA St. Joseph, LLC hereby seeks leave of this Court through under-signed counsel to file a responsive pleading out of time.

This motion is not filed to cause undue delay. The Complaint was served on January 14, 2025 and a response was due on February 4, 2025. Under-signed counsel needs extra time to file a responsive pleading due to a family emergency.

Pursuant to Local R. Civ. P. 7.2 this Motion has been captioned “unopposed” following opposing counsel’s consent to a three-day extension until February 7, 2025 to file a responsive pleading. Neither the movant nor undersigned counsel have previously sought any extension or leave to file out of time in this case. This three-day delay should provide the Court ample time for consideration before the initial conference set for March 31, 2025.

DATED: FEBRUARY 5, 2025
HOUSTON, TEXAS

RESPCTFULLY SUBMITTED,

/s/ Asim Ghafoor

Asim Ghafoor (SDTX Bar #1384109)
Healthcare Systems of America, Regional Counsel
1401 St. Joseph Parkway
Houston, TX 77002
(202) 330 1469
aghafoor@hsahospitals.com
ATTORNEY FOR DEFENDANT
HSA ST. JOSEPH LLC

CERTIFICATE OF SERVICE

I hereby certify that, on February 5, 2025, a true and correct copy of the foregoing document was served as provided by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Asim Ghafoor
Asim Ghafoor
Counsel for Defendant